



January 5, 2015

Dan Dallas, Rio Grande National Forest Supervisor
1803 West Highway 160
Monte Vista, Colorado 81144

Reviewing Officer, Dan Jiron
Regional Forester, USDA, Forest Service, Region 2
740 Simms Street
Golden, CO 80401-4720

Via e-mail: r02admin_review@fs.fed.us, ddallas@fs.fed.us

RE: Chama Peak Land Alliance Perspective on the Village of Wolf Creek

Dear Mr. Dallas and Mr. Jiron:

The Chama Peak Land Alliance (Alliance) is an association of conservation minded landowners working collaboratively to practice and promote ecologically and economically sound land management in the southern San Juan Mountains of Colorado and northern New Mexico. As such, we respect and defend private landowner rights to manage their land as they see fit.

Yet, we also recognize that we are all part of a broader, connected landscape, where one action affects another. How one of us chooses to manage our lands will undoubtedly affect our neighbors and the wildlife that use private lands for breeding, daily feeding, and movement from summer to winter ground. This holds true for the matrix of public, private, tribal and state lands that exist in southern Colorado and northern New Mexico.

Efforts to conserve America's natural heritage are often focused solely on public lands. And yet, the most biologically diverse lands in the West are largely in private hands, providing habitat for nearly two-thirds of all federally listed species. The nation's rural landowners, its farmers, ranchers, and forest owners, provide not only food and fiber for the world, but also a host of environmental benefits, including clean water, wildlife habitat, and economic activity that results in sustained growth for local communities.

The proposed Village of Wolf Creek is of great concern to the Chama Peak Land Alliance because of its impact on our region's wildlife populations and rural way of life. The land swap that the Village is founded on is a highly questionable outcome from a process that began more than 30 years ago and creates an island of private land surrounded by Rio Grande National Forest in a fragile, high elevation zone of our national forest. Contemplating a city of thousands of residential units, parking for more than 4,000 vehicles, a dozen restaurants, more than 200,000 square feet of commercial space, and storage for 25-30 million gallons of water is not consistent with the way the public and the local community wants to see our public and private lands managed, especially in this particular location.

Upon reviewing your draft Record of Decision (ROD), we believe that the scale of development proposed on Wolf Creek Pass will impact natural resources and wildlife beyond any reasonable mitigation.

Our greatest concerns include:

- Wolf Creek Pass and its surrounding lands constitute a critical wildlife linkage lying immediately to the north of the Alliance landscape. The Alliance landscape encompasses almost 1.3 million acres of land in NM and CO and runs south of Wolf Creek Pass through Chama, NM and to the east and west of Chama, NM as well. This area is currently an intact landscape where private landowners are managing responsibly as stewards of the land (see map on page 4). Elk and mule deer travel throughout this region from winter range on the Jicarilla Apache Nation and Southern Ute Indian Tribe to summer range on the private lands north of Chama all the way to Wolf Creek Pass. Elk and mule deer, in particular, are critically important to the economy of our landscape.
- The proposed Village could seriously disrupt this wildlife linkage, especially for the Canada lynx. Increased vehicular traffic will result in higher mortality rates for lynx as a result of greater wildlife-vehicle collisions. The impact of the loss of 147 acres of lynx habitat, as detailed in the ROD, will extend far beyond the land swap boundary due to potential avoidance by lynx from an increase in human activity. Education, outreach, and monitoring are not sufficient to minimize these adverse effects to lynx, as the ROD states it will do on page 5. There will also be significant disruption to other native species as this project approaches "build out."
- With climate change reducing snow pack in western North American mountains and shifting distribution of forests northward and up mountain slopes,¹ high elevation linkage zones including Wolf Creek Pass will gain increasing importance as climate change alters wildlife habitat for myriad species including mule deer, elk, black bear and other species in the region.
- The health and human safety concerns of a development of this magnitude at 10,000 feet should not be understated. The cost of services to both Archuleta and Mineral counties, and its residents,

¹ Interagency Lynx Biology Team. 2013. Canada lynx conservation assessment and strategy. 3rd edition. USDA Forest Service, USDI Fish and Wildlife Service, USDI Bureau of Land Management, and USDI National Park Service. Forest Service Publication R1-13-19, Missoula, MT. 128 pp.

could be economically detrimental for this rural and mostly agricultural landscape. The counties have suffered in the past due to boom and bust economic cycles. Associated land development has occurred on both sides of the pass, of varying quality and impact to the region. New developments are permitted, but not always completed as planned with unexpected costs to the local governments that invariably occur. Infill of existing developments and revitalization of Pagosa Springs and South Fork would far better serve the long-term needs of southwestern Colorado, than building a whole new village of this magnitude on Wolf Creek Pass.

- The Village of Wolf Creek does not meet the intent and direction of the current Rio Grande National Forest Management Plan given the potential and likely impacts to wildlife stated above. Furthermore, a current revision of the management plan is underway, and this decision should be deferred to allow for the revised guidance of that plan before action is taken on Wolf Creek Pass.
- The proposed Village of Wolf Creek is not in the public's best interest and will not achieve better management of Federal lands and resources as stated in the public interest determination on page 24 of the ROD.

As such, the Chama Peak Land Alliance believes it is our responsibility to voice our concern about the draft ROD. The Village of Wolf Creek is not responsible land stewardship, and it is our mission to provide leadership through action for responsible land stewardship in our region.

Please do not hesitate to contact me, or the Alliance's Executive Director, Monique DiGiorgio, with any questions about these comments. We realize that we do not have standing on this issue and cannot submit a formal objection. We were formed in 2010 and, therefore, did not have an opportunity to comment previously through the environmental planning process.

However, this proposed development is of great enough concern to us that we have chosen to submit comments nonetheless. The proposed land exchange and subsequent development will dramatically impact the region that many of us are working so tirelessly to protect.

Sincerely,



Frank Simms, Board Chair
Chama Peak Land Alliance

Cc: The Honorable Governor of the state of Colorado, John Hickenlooper

